

Union Gap School
DISTRICT NO. 2
3200 SOUTH SECOND STREET
UNION GAP, WASHINGTON 98903
(509) 248-3966

May 11, 1995

DOCKET FILE COPY ORIGINAL

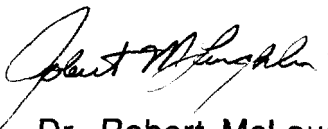
The Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Secretary:

Enclosed are an original and four copies of an FM Petition for Rule Making. The petition is to add 252A at Yakima, Washington to the Table of Assignments, FCC Rule 73.202. The petition contains an Engineering Study which includes a FM Spacing Study.

I certify that I have reviewed the Engineering Study and that I am the petitioner.

Sincerely,



Dr. Robert McLaughlin
Superintendent

cc: D. R. Perry
Radio Station Advisor

Sharon P. McDonald
FCC

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PETITION TO THE FEDERAL COMMUNICATIONS COMMISSION
TO ADD CHANNEL 252A AT UNION GAP, WASHINGTON
TO THE FM TABLE OF ASSIGNMENTS, FCC RULE 73.202

APRIL 6, 1995

ENGINEERING STATEMENTS

This petition by Union Gap School District No. 2 of Union Gap, Washington is being submitted after a search of the Non-commercial band provided no available channel. This petition requests assignment of Commercial channel 252A to Union Gap, Washington. Exhibit no. 1 shows the proposed site and previous 252A site when assigned to Yakima. The petitioner intends to apply for the channel as soon as it is assigned.

This channel was in the Table of Assignments prior to 1976. An application was prepared by this engineer on 3/23/1976. The station was constructed shortly thereafter with the call letters KBBO(FM) and later changed to KRSE. During the mid 1980's, channel 289C1 was assigned to the Yakima area by Docket D84-231. KRSE then applied for channel 289C1 and upon grant of a construction permit (CP) they moved to this channel. To our knowledge, no paper work was ever prepared to delete channel 252A. A telephone call to the Allocations Branch resulted in their concurrence to this fact, and that it was an oversight by the Commission that the channel 252A no longer appears in the Table of Assignments.

Enclosed is a "FM Spacing Study" (Exhibit no. 2) obtained from Dataworld using both the FCC and the Dataworld Databases. The proposed coordinates used for this study are 3.3 km. closer to Seattle than those for the original 252A KRSE Yakima licensed facility. The FCC Database shows a KING(FM) 251C "CP" which would give 20.85 km clearance. The FCC database also shows that the licensed KING-FM of Seattle on 251C is short spaced by 9.82 km which means it was originally short spaced. FCC Rule 73.215(e) Table shows the minimum short-spacing for this class "A" to "C" first adjacency to be 142 km. The separation for the proposed site to the licensed KING site is 155.2 km. The proposed site is on the Valley floor and the previous site was on a hill top. The Union Gap School plans to install the antenna atop their building and operate a station at 250 watts of power. At this proposed operation with the Cascade mountains between the two sites, there would be no repeat no overlap of any service contour by an interference contour.

The KING Seattle licensed station is using a directional antenna which is soft (Field of .44:1) toward Yakima. There was no contour overlap with KRSE operating at an HAAT of 169 meters with 700 watts ERP. Our Union Gap School District No.2 proposal will be at an HAAT of -76 meters and 250 watts ERP. Therefore there is no possibility of contour overlap even at 3.0kw with this channel allocation proposal and it will be making the best use of the channel. The Union Gap School District #2 is only interested in the coverage of the city of Union Gap so that the 250 watts is more than adequate for their needs.

In conclusion, it is respectfully requested that channel 252A be once again added to the Table of Assignments, FCC Rule 73.202.

George M. Frese, P.E.

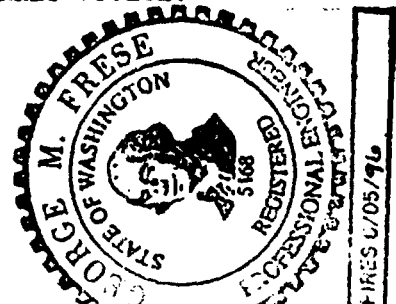
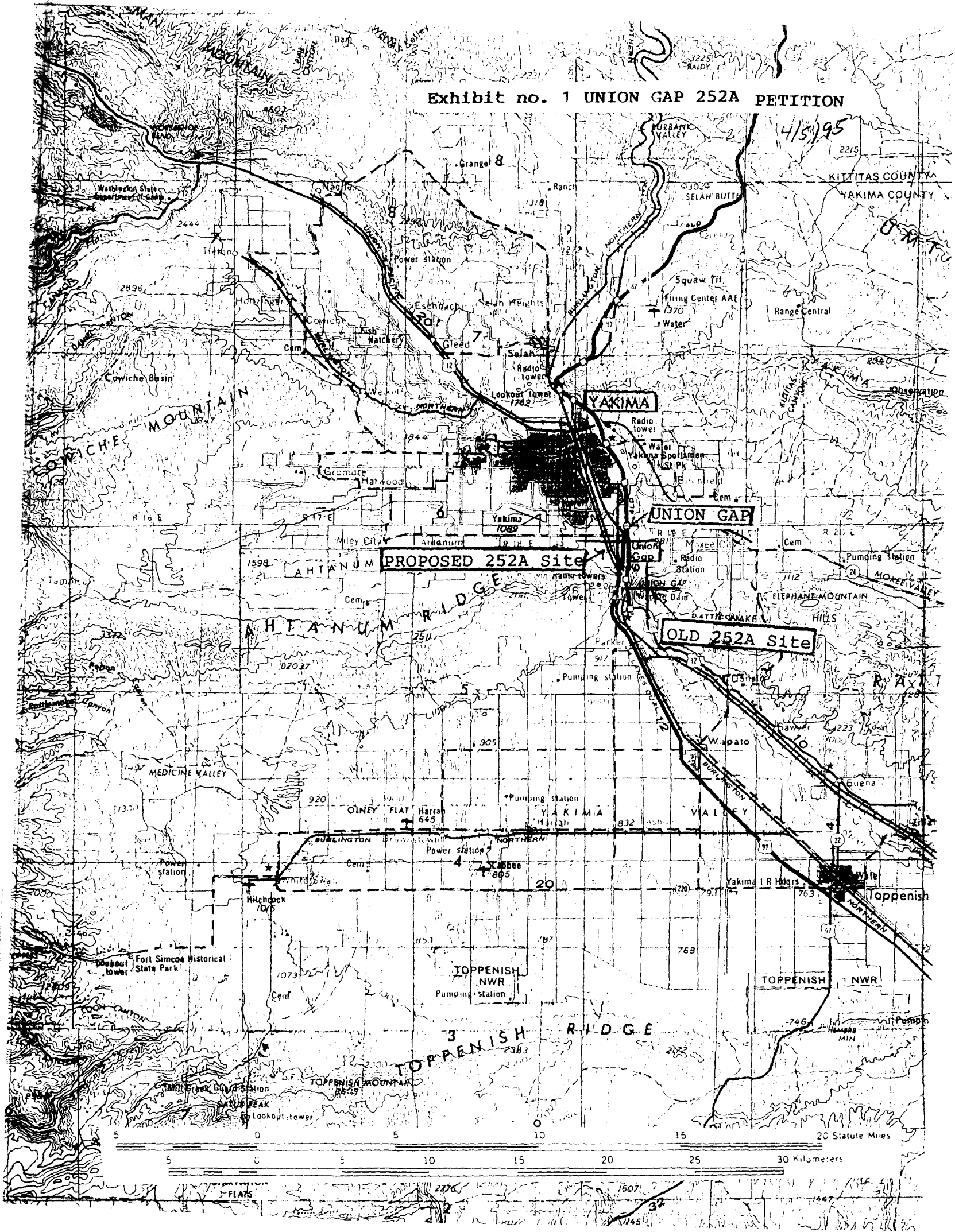


Exhibit no. 1 UNION GAP 252A PETITION

4/5/95



FM Spacing study

Title: uNION GAP
Channel 252A (98.3 MHz)
Database: DW 03/20/95

Latitude: 46-33-19
Longitude: 120-28-38
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KYSN	LIC	SUNBROOK WENATCHEE, LP	249A	3	47-22-52	8.8	92.93	31
EAST WENATCHEE	WA		97.7	-45	120-17-16	189.0	61.93	CLEAR

Deletion proposed; ORDERED TO 266A

KLKY	LIC	ALEXANDRA COMMUNICATIONS	250C2	8	45-59-38	108.6	187.8	55
MILTON-FREEWATER	OR	BLH-931018KA	97.9	339	118-10-47	290.3	132.8	CLEAR

DOC-92-292; RM-8135; ONE-STEP APPLICATION TO CHANGE CLASS TO C1; Was KLUB 09/21/92 per FCC release #191 dated 09/25/92; Ant: Jampro JMCP-6

KING-FM LIC	CLASSIC RADIO, INC.	251C	57DA	47-30-14	313.4	155.2	✓	165
SEATTLE	WA	BLH-921130KC	98.1	714BT121-58-29	132.4	-9.82		SHORT

DA: Elec. Res. Inc. 1082-4CP-DA @ 0 deg

KEYW	LIC	UNITED BROADCASTING, INC	252A	3	46-08-48	112.8	115.3	✓
PASCO	WA	BLH-860701KA	98.3	59	119-05-59	293.8	.350	CLOSE

Was KTCW 04/15/86

KEYG-FM LIC	WHEELER BROADCASTING, IN	253C	100	47-49-18	39.1	183.1	✓	165
GRAND COULEE	WA	BLH-931230KB	98.5	303	118-55-59	220.2	18.08	CLEAR

Ant: Shiveley 6810; Affiliated with KEYG(AM)

NEW	APP	FIRST LOVE MINISTRIES, I	254A	6	46-13-10	135.7	52.10	31
MABTON	WA	BPH-950105MC	98.7	100	120-00-17	316.0	21.10	CLEAR

Received per FCC release #16097 dated 01/26/95

ALLOC			254A		46-12-42	136.4	52.71	31
MABTON	WA	DOC-94-23	98.7		120-00-18	316.7	21.71	CLEAR

Granted effective 12/05/94, adopted 10/12/94, released 10/21/94; Filing window 12/05-01/05/95 **CLOSED** ; RM-8439

NEW	APP	BOGART-FUNK ENTERPRISES,	254A	1.14	46-08-01	140.4	60.79	31
MABTON	WA	BPH-950105MA	98.7	220	119-58-28	320.7	29.79	CLEAR

Received per FCC release #16092 dated 01/19/95

KEZX-FM LIC	ROY H. PARK BCG OF WASH.	255C	96	47-32-41	312.3	165.7		95
SEATTLE	WA		98.9	338	122-06-28	131.1	70.68	CLEAR

BRH-941003UA(16037-11/8/94); Was KEZX 12/31/86; Affiliated with KEZX(AM)

>> End of channel 252A study <<

FM Spacing study

Title: uNION GAP
Channel 252A (98.3 MHz)
Database: FCC 02/21/95

Latitude: 46-33-19
Longitude: 120-28-38
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Er-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
PRM	ADD	Murray Broadcasting	249A		47-22-52	8.8	92.93	31
East Wenatchee	WA	DOC-95-14	97.7		120-17-16	189.0	61.93	CLEAR
KLKY	LIC	Alexandra Communications	250C2	8	45-59-38	108.6	187.8	55
Milton-Freewater	OR	BLH-931018KA	97.9	339	118-10-47	290.3	132.8	CLEAR
KING-FM LIC		Classic Radio, Inc.	251C	58DA	47-30-14	313.4	155.2	165
Seattle	WA	BLH-921130KC	98.1	714BT	121-58-29	132.4	-9.82	SHORT
DA: oddball ODD920707ID @ 0 deg								
KING-FM CP		Classic Radio, Inc.	251C	100	47-37-55	310.9	185.8	165
Seattle	WA	BPH-861104IE	98.1	319	122-20-59	129.5	20.85	CLEAR
ALLOC			251C		47-37-55	310.9	185.8	165
Seattle	WA		98.1		122-20-59	129.5	20.85	CLEAR
KEYW	LIC	United Broadcasting, Inc	252A	3	46-08-48	112.8	115.3	115
Pasco	WA	BLH-860701KA	98.3	60	119-05-59	293.8	.350	CLOSE
ALLOC			252A		46-08-48	112.8	115.3	115
Pasco	WA		98.3		119-05-59	293.8	.350	CLOSE
KEYG-FM LIC		Wheeler Broadcasting, In	253C	100	47-49-18	39.1	183.1	165
Grand Coulee	WA	BLH-931230KB	98.5	303	118-55-59	220.2	18.08	CLEAR
ALLOC			253C		47-52-58	37.0	186.5	165
Grand Coulee	WA	DOC-89-131	98.5		118-58-20	218.2	21.49	CLEAR
NEW	APC	First Love Ministries, I	254A	6	46-13-10	135.7	52.10	31
Mabton	WA	BPH-950105MC	98.7	100	120-00-17	316.0	21.10	CLEAR
ALLOC			254A		46-12-42	136.4	52.71	31
Mabton	WA	DOC-94-23	98.7		120-00-18	316.7	21.71	CLEAR
Filing window 12/05-01/05/95 **CLOSED**								
NEW	APC	Bogart-Funk Enterprises,	254A	1.15	46-08-01	140.4	60.79	31
Mabton	WA	BPH-950105MA	98.7	220	119-58-28	320.7	29.79	CLEAR
KEZX-FM LIC		Roy H. Park B/Cting of W	255C	100	47-32-41	312.3	165.7	95
Seattle	WA	BLH-7742	98.9	338BT	122-06-28	131.1	70.68	CLEAR

>> End of channel 252A study <<